

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MATTHEW T. SHAFER, ON BEHALF OF
HIMSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

MORGAN STANLEY, MORGAN STANLEY
SMITH BARNEY LLC, MORGAN STANLEY
COMPENSATION MANAGEMENT
DEVELOPMENT AND SUCCESSION
COMMITTEE, and John/Jane Does 1-20,

Defendants.

Civil Action No. 1:20-cv-11047

CLASS ACTION

**PLAINTIFF'S MOTION FOR JOINDER OF ADDITIONAL
NAMED PLAINTIFFS AND PROPOSED CLASS REPRESENTATIVES**

PLEASE TAKE NOTICE that Plaintiff Matthew T. Shafer will respectfully move this Court before the Honorable Paul G. Gardephe, at the United States Courthouse, 40 Foley Square, Courtroom 705, New York, New York 10007, at such time as counsel may be heard, to join as additional named plaintiffs and proposed class representatives (1) Sheri Haugabook, (2) Peter Heidt, (3) Randall Powers, (4) Jeffrey Shover, and (5) Mace Tamse, pursuant to Rule 20(a)(1) of the Federal Rules of Civil Procedure. The grounds supporting the Motion are set forth in the accompanying Memorandum of Law.

Defendants' counsel have informed the undersigned that Defendants do not plan to file an opposition to this Motion,¹ provided that Plaintiff include the following statement:

¹ In accordance with Section IV.C of the Court's Individual Rules of Practice, Plaintiff is therefore filing the Motion on ECF without awaiting a response.

Defendants oppose the addition of these plaintiffs through joinder without pleading allegations supporting their claims but, while reserving all arguments respecting the arbitrability, implausibility, and lack of merit of the plaintiffs' claims, do not oppose the addition of these individuals as plaintiffs through a properly pleaded amended complaint.

WHEREFORE, Plaintiff respectfully requests that the Court grant his Motion for Joinder of Additional Named Plaintiffs and Proposed Class Representatives.

Dated: March 3, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021, a copy of the foregoing Plaintiff's Motion for Joinder of Additional Named Plaintiffs and Proposed Class Representatives was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Mathew P. Jasinski
Mathew P. Jasinski